

Responses to Verbal Comments at Public Hearings

The following pages summarize responses to verbal comments received at 5 public hearings. It should be noted that only comments directly pertaining to the environmental analysis have been responded to. The State CEQA guidelines state that, in a final EIR, the lead agency's response to comments can focus on comments and recommendations that raise significant environmental issues on the draft EIR (Sections 15132[b], 15204[a]). A list of commenters at the public hearings is shown in Table 3-3.

August 16, 1999 (1 p.m.), Palmdale Cultural Center, Palmdale, CA

- P1-1. The commenter questions how pathogens will be mitigated (because pathogens are considered death-causing agents) and if the project has already been approved. The EIR analysis concluded that the land application of biosolids would not cause significant impacts to the public and the environment if biosolids are land applied under the conditions in the proposed GO. Additionally, the draft EIR has undergone the public review process required by CEQA and no decision on the project will be made until after the final EIR has been completed.
- P1-2. Please refer to Master Response 5 and 9 regarding measures that are in the proposed GO to prevent biosolids from being blown off agricultural fields and measures recommended in the draft EIR to control dust. Furthermore, the draft EIR concluded that the land application of biosolids would not result in significant air quality impacts.
- P1-3. The commenter's concern is in regards to the metals limits cited in the proposed GO. These limits are based on the federal Part 503 regulations (in addition to a ceiling limit for molybdenum—see Master Response 4) and have been established to ensure that excessive levels of heavy metals do not occur.
- P2-1. Mr. Yore's comments relate to public health and water quality effects resulting from the land application of biosolids. Mr. Yore is concerned that people will be exposed to diseases resulting from land-applied biosolids. Please refer to Chapter 5 of the draft EIR and Appendix B (formerly draft EIR Appendix E) of this final EIR for the public health analysis. Appendix B has been revised since the draft EIR was circulated. Appendix B (as well as the draft EIR) concluded that the land application of biosolids would not result in significant public health impacts. Furthermore, the proposed GO has also been developed to protect water quality. Draft EIR Chapter 4 concludes that the land application of biosolids would not result in significant water quality impacts.
- P3-1. Mrs. Cade's correspondence (comment letter 39) on the draft EIR included the concerns she raised at the public hearing. Please refer to the responses to comment letter 39.

- P4-1. Mr. Cade (with Mrs. Cade) submitted correspondence (comment letter 39) on the draft EIR that included the concerns he raised at the public hearing. Please refer to the responses to comment letter 39.
- P5-1. The commenter implies that biosolids-applied land could be sold without the potential buyer knowing that biosolids had been applied. Mitigation Measure 4-3 (in the draft EIR) would establish a tracking system to identify sites where biosolids have been applied. Therefore, potential buyers would be aware that biosolids had been applied to property they are interested in purchasing.
- P6-1. The commenter's correspondence (comment letter 49) included the information he stated at the public hearing. Refer to the responses to comment letter 49.

August 16, 1999 (6 p.m.), Palmdale Cultural Center, Palmdale, CA

- P7-1. Comment noted. The comment does not relate to the draft EIR. Furthermore, the proposed GO includes measures to require covering of biosolids, and other measures, to prevent biosolids from being blown offsite.
- P7-2. Comment noted. The comment is not related to the contents of the draft EIR.
- P7-3. Refer to Master Responses 5 and 9.
- P7-4. Refer to Master Response 1 and Chapter 3 of the draft EIR.
- P7-5. Comment noted. The comment is not related to the contents of the draft EIR.
- P7-6. Comment noted. The draft EIR indicates that several impacts could be considered significant or potentially significant but concludes after the analysis that all impacts are considered less than significant (some with the implementation of mitigation measures), based on CEQA significance criteria.
- P7-7. Haul routes will be identified in the preapplication report.
- P7-8. Comment noted.
- P7-9. Comment noted.
- P7-10. Comment noted.
- P8-1. Refer to Master Response 1.
- P9-1. Comment noted.

August 17, 1999 (1 p.m.), Women's Club of Bakersfield, Bakersfield, CA

- P10-1. This commenter submitted comment letter 26. Refer to the responses to this comment letter.
- P11-1. This commenter submitted comment letter 28. Refer to the responses to this comment letter.
- P12-1. This commenter submitted comment letter 25. Refer to the responses to this comment letter.
- P13-1. Comment noted.
- P14-1. This commenter submitted comment letter 49. Refer to the responses to this comment letter.
- P15-1. Comment noted.
- P16-1. Comment noted.

August 17, 1999 (6 p.m.), Women's Club of Bakersfield, Bakersfield, CA

P17-1. The commenter expresses concerns about several issues:

- # The purpose of preparing an EIR, if the project description already states that biosolids are "capable of being used beneficially." The EIR evaluates the project's environmental impacts. This is a statewide general order to allow biosolids land application; it does not evaluate the overall benefit of biosolids application.
- # The time required for pathogens to proliferate and the need to strengthen the Part 503 regulations accordingly. See Master Response 4 for an explanation of the standards applied in the EIR that are stricter than those in the Part 503 regulations. However, those rules have been prepared by EPA and must be revised by that agency. Also see Master Responses 7 and 8 with regard to revisions to Mitigation Measures 4-2 and 5-2 and the reasons for extending grazing period restrictions after biosolids land application.
- # Requirement for groundwater monitoring if groundwater is less than 25 feet deep. See Master Responses 14 and 15 for a full discussion of this issue with regard to the Part 503 regulations.
- # Request for more information about SOCs, pathogen proliferation, and the overall safety of biosolids land application. Although the Part 503 regulations are not

universally accepted, they were prepared by EPA after extensive study of the best available scientific data (see Master Response 15). Such information will continue to be gathered and taken into account with regard to the Part 503 regulations and the proposed GO. For this reason, the proposed GO program is proposed to have a 15-year horizon, at which point it could be extensively revised based on additional scientific evidence.

- # Mitigation Measures 7-1 and 7-2 do not identify what mitigation is required for endangered species. These mitigation measures refer to the preapplication report that must be filed before a particular site can be considered for land application of biosolids. If a site has been fallow for more than 1 year, a biological survey report must be prepared by a qualified biologist before the preapplication report is submitted that identifies appropriate mitigation measures. That information would be included in the preapplication report for review by the RWQCB and the California Department of Fish and Game.

- P18-1. The commenter's primary concern is with setbacks around surface water bodies. See Master Response 17 for information about surface water setbacks and their effects on water quality.
- P19-1. The City of Los Angeles has submitted written comments in letter 14.

August 23, 1999 (10 a.m.), SWRCB, Sacramento, CA

- P20-1. The commenter submitted correspondence (comment letter 8) that included the comments he raised during the public hearing. Please see the responses to comment letter 8.
- P21-1. See Master Responses 2 and 3.
- P22-1. The commenter submitted correspondence (comment letter 30) that included the comments he raised at the public hearing. Please see the responses to comment letter 30.
- P23-1. The commenter submitted correspondence (comment letter 23) that included the comments he raised at the public hearing. Please see the responses to comment letter 23.
- P24-1. The commenter submitted correspondence (comment letter 9) that included the comments he raised at the public hearing. Please see the responses to comment letter 9.

P25-1. The commenter submitted correspondence (comment letter 42) that included the comments he raised at the public hearing. Please see the responses to comment letter 42.